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Attorneys for Defendants Jason R. Anderson, Jacob S. Anderson, Schad E. Brannon, Roydon B. Nelson, and Relief Defendants Business Funding Solutions, LLC; Blox Lending, LLC; The Gold Collective LLC; and UIU Holdings, LLC

**IN THE UNITED STATES DISTRICT COURT
THE DISTRICT OF UTAH, NORTHERN DIVISION**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

DIGITAL LICENSING INC. (d/b/a “DEBT
Box”), a Wyoming corporation;
JASON R. ANDERSON, an individual;
JACOB S. ANDERSON, an individual;
SCHAD E. BRANNON, an individual;
ROYDON B. NELSON, an individual;
JAMES E. FRANKLIN, an individual;

**STIPULATED MOTION FOR LEAVE TO
FILE THE ACCOUNTINGS OF
DEFENDANTS JASON ANDERSON, JACOB
ANDERSON, SCHAD BRANNON, AND
ROYDON NELSON UNDER SEAL**

Case No. 2:23-cv-00482-RJS

Chief Judge Robert J. Shelby

WESTERN OIL EXPLORATION
COMPANY, INC., a Nevada corporation;
RYAN BOWEN, an individual;
IX GLOBAL, LLC, a Utah limited liability
company;
JOSEPH A. MARTINEZ, an individual;
BENJAMIN F. DANIELS, an individual;
MARK W. SCHULER, an individual;
B & B INVESTMENT GROUP, LLC (d/b/a
“CORE 1 CRYPTO”), a Utah limited
liability company;
TRAVIS A. FLAHERTY, an individual;
ALTON O. PARKER, an individual;
BW HOLDINGS, LLC (d/b/a the “FAIR
PROJECT”), a Utah limited liability
company;
BRENDAN J. STANGIS, an individual; and
MATTHEW D. FRITZSCHE, an individual,

Defendants,

ARCHER DRILLING, LLC, a Wyoming
limited liability company;
BUSINESS FUNDING SOLUTIONS, LLC,
a Utah limited liability company;
BLOX LENDING, LLC, a Utah limited
liability company;
CALMFRTZ HOLDINGS, LLC, a Utah
limited liability company;
CALMES & CO, INC., a Utah corporation;
FLAHERTY ENTERPRISES, LLC, an
Arizona limited liability company;
IX VENTURES FZCO, a United Arab
Emirates company;
PURDY OIL, LLC, a Nebraska limited
liability company;
THE GOLD COLLECTIVE LLC, a Utah
limited liability company; and
UIU HOLDINGS, LLC, a Delaware limited
liability company,

Relief Defendants.

Pursuant to DUCivR 5-3(b)(2) and Federal Rule of Civil Procedure 5.2, Defendants Jason Anderson, Jacob Anderson, Schad Brannon, and Roydon Nelson, with the concurrence of the Securities and Exchange Commission, concurrently move the Court for leave for Defendants Jason Anderson, Jacob Anderson, Schad Brannon, and Roydon Nelson to file the accountings of their assets (the “Accountings”) under seal.

This Court previously ordered that Defendants Jason Anderson, Jacob Anderson, Schad Brannon, and Roydon Nelson prepare an accounting of their assets and to deliver the documents to counsel for the Commission. The Court also ordered Defendants Jason Anderson, Jacob Anderson, Schad Brannon, and Roydon Nelson to simultaneously file the Accountings with the Court.

The Accountings contain confidential and highly personal information that should not be publicly disclosed. Accordingly, Defendants Jason Anderson, Jacob Anderson, Schad Brannon, and Roydon Nelson and the Commission file this stipulated motion seeking leave for these defendants to file the Accountings under seal to protect their privacy.

For these reasons, the Commission and Defendants Jason Anderson, Jacob Anderson, Schad Brannon, and Roydon Nelson respectfully request that leave to file the Accountings of Defendants Jason Anderson, Jacob Anderson, Schad Brannon, and Roydon Nelson under seal be granted as set forth in the proposed order submitted concurrently herewith.

DATED this 22nd day of August, 2023.

KUNZLER BEAN & ADAMSON, PC

/s/ Matthew R. Lewis

Matthew R. Lewis

Taylor J. Smith

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on this 22nd day of August, 2023, I caused a true and correct copy of the foregoing **STIPULATED MOTION FOR LEAVE TO FILE THE ACCOUNTINGS OF DEFENDANTS JASON ANDERSON, JACOB ANDERSON, SCHAD BRANNON, AND ROYDON NELSON UNDER SEAL** to be submitted for electronic filing through the Court's CM/ECF system and accordingly served on the following:

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